



*Consulting Engineers
and Scientists*

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December 9, 2010
(PBW Project No. 1589)

VIA ELECTRONIC MAIL

Mr. Chris Villarreal
Remedial Project Manager, 6SF-RA
U.S. Environmental Protection Agency Region 6
1445 Ross Avenue
Dallas, Texas 75202

Re: Bi-Monthly Progress Report, R&H Oil/Tropicana Energy Site, San Antonio, Texas

Dear Mr. Villarreal:

Pursuant to Section IX, Paragraph 37 of the Administrative Settlement Agreement and Order on Consent for Remedial Investigation/Feasibility Study (Settlement Agreement) for the above-referenced Site, Pastor, Behling & Wheeler, LLC (PBW) has prepared this bi-monthly progress report on behalf of the Respondents named in the Settlement Agreement. In accordance with the Settlement Agreement requirements, this progress report addresses the topics listed below:

1. Actions which have been taken to comply with the Settlement Agreement during the preceding two-month period – The following actions were taken during the previous two-month period:
 - Final versions of the documents listed below were submitted to EPA on September 24, 2010:
 - Remedial Investigation/Feasibility Study (RI/FS) Work Plan (pursuant to Statement of Work (SOW) Paragraph 26);
 - RI/FS Field Sampling Plan (FSP) (pursuant to SOW Paragraph 27);
 - RI/FS Quality Assurance Project Plan (QAPP) (pursuant to SOW Paragraph 27); and
 - RI/FS Site Health and Safety Plan (HASP)(pursuant to SOW Paragraph 29).

These documents were approved by your letter dated November 23, 2010.

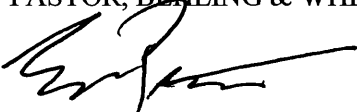
- Attempts were made to obtain access to the drainage ditch west of the Site (pursuant to Settlement Agreement Paragraph 52). A description of these efforts was provided in a September 3, 2010 letter from Ms. Elizabeth Webb to Ms. I-Jung Chiang and you. An update on these efforts was provided in an October 29, 2010 letter from Ms. Webb to Ms. Chiang and you. These efforts are ongoing.

- The name, title, and qualifications of the proposed drilling subcontractor (Vortex Drilling, Inc.) were provided in a letter from me to you dated October 26, 2010 (pursuant to Settlement Agreement Paragraph 28).
2. Quality-assured results of sampling, tests and all other quality-assured data received by Respondents during the preceding two-month period – No data were received or generated during the preceding two-month period.
3. Work planned for next two months with schedules relating such Work to the overall project schedule for RI/FS completion – The following work is planned for the next two months:
- Preparation and submittal of an addendum to the September 24, 2010 RI/FS Work Plan and Field Sampling Plan as requested in your November 23, 2010 letter.
 - Installation, development, gauging, and sampling of five off-site groundwater monitoring wells; and
 - Laboratory analyses of groundwater samples collected from these five off-site groundwater monitoring wells.
- The planned schedule for this work is consistent with the overall RI/FS schedule provided in the approved RI/FS Work Plan.
4. Problems encountered, anticipated problems, actual or anticipated delays, and solutions developed and implemented to address any actual or anticipated problems or delays – No problems or delays were encountered or anticipated during the preceding two-month period.

Thank you for the opportunity to submit this progress report. Should you have any questions, please do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC



Eric F. Pastor, P.E.
Principal Engineer

Mr. Chris Villarreal

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cc: Marilyn Long – Texas Commission on Environmental Quality (TCEQ)
Taryn Scholz – Quality Assurance Associates, Inc.
Heather Corken – Fulbright & Jaworski, LLP
Gary Elkin – BAE Systems Resolution, Inc.
Heidi Hughes Bumpers – Jones Day
Mike Peters – Structural Metals, Inc.
Mary Smith - Office of the Attorney General of Texas
Robert Sterrett – Itasca Denver, Inc.
Elizabeth Webb – Thompson & Knight, LLP
Leslie Alexander – de maximis, inc.
Jim AuBuchon – Structural Metals, Inc.
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